

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY

MDJ: Hon. KIM M. HOOTS
Magisterial District Number: 05-2-10
Address: 907 WEST ST./PENN WEST OFFICE B
PITTSBURGH, PA 15221

Phone: 412.241.6529



ORIGINAL

POLICE ORIGINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS

ORIGINAL

DEFENDANT:

(NAME and ADDRESS):

TODD ANTHONY ROBINSON
First Name Middle Name Last Name Gen
1304 SUPERIOR AVE APT. 1 PITTSBURGH, PA 15212

NOC Extradition Code Type

Folony - Full Extradition

Distance

8906

DEFENDANT IDENTIFICATION INFORMATION

CR 181-17

Docket Number	Date Filed	OTN Live Scan Number	Complaint/Incident Number	SID	Request Lab Services?
181-17	4-25-17	G 773906-0	8667-17		<input type="checkbox"/> Yes
GENDER MALE	DOB 11/09/1977	POB	Addl DOB	Co-Defendant(s) <input type="checkbox"/>	
RACE BLACK	First Name		Middle Name	Last Name	Gen
ETHNICITY	AKA				
HAIR COLOR XXX (UNK./BALD)	EYE COLOR BRO (BROWN)				
Driver License	State PA	License Number 26489938	Expires	WEIGHT (lbs)	
DNA	DNA Location		180		
FBI Number	MN Number		PL HEIGHT in		
Defendant Fingerprinted			6 07		
Fingerprint Classification					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat	Registration Sticker (MMYY)	Commil Veh Ind	School Veh	Other NOC Veh Code	Reg Same as Def.
VIN	Year	Make	Model	Style	Color		<input type="checkbox"/>

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 607.)

Name of the attorney for the Commonwealth

(Signature of the attorney for the Commonwealth)

(Date)

I, TODD DOLFI / THOMAS FOLEY

37063

(Name of the Affiant)

(PSFM/PCETC Assigned Affiant ID Number & Badge #)

of ALLEGHENY COUNTY POLICE

PA0022800

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state (check appropriate box)

1. X I accuse the above named defendant who lives at the address set forth above

I accuse the defendant whose name is unknown to me but who is described as

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have, therefore, designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at

478

WILKINSBURG BORO

(Subdivision Code)

(Place Political Subdivision)

In Allegheny County

02

(County Code)

on or about 04/24/2017 5:30

17 APR 25 PM 3:28

EXHIBIT A

RECEIVED

AUG 25 2022

CLERK, U.S. DISTRICT COURT



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	CINLiveScan Number G 773806-0	Complaint/Incident Number 8667-17
Defendant Name	First TODD	Middle ANTHONY	Last ROBINSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits 204 PA Code §§213.1-213.7.)

Indicate Offense	<input type="checkbox"/> Attempt 18901.A	<input type="checkbox"/> Solicitation 18902.A	<input type="checkbox"/> Conspiracy 18903						
X	1	2702	A2	of the	18	2	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NGC Offense Code	UCR/NERS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense									
18 2702A2 AGGRAVATED ASSAULT F1 2 COUNTS The actor attempted to cause or intentionally, knowingly or recklessly caused serious bodily injury to SGT. MATT MORRISON while in the performance of duty, as defined in section 2702(c) or engaged in public transportation, in violation of 18 Pa. C.S. §2702(a)(2). The actor attempted to cause or intentionally, knowingly or recklessly caused serious bodily injury to OFC. CHRIS DUNCAN while in the performance of duty, as defined in section 2702(c) or engaged in public transportation, in violation of 18 Pa. C.S. §2702(a)(2).									

Indicate Offense	<input type="checkbox"/> Attempt 18901.A	<input type="checkbox"/> Solicitation 18902.A	<input type="checkbox"/> Conspiracy 18903						
	2	6105	A1	of the	18	1	F2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NGC Offense Code	UCR/NERS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense									
18 6105A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS F2 1 COUNT The actor, who was previously convicted of an offense enumerated in subsection (b), namely CRIMINAL HOMICIDE within or without this Commonwealth, regardless of the length of sentence, possessed, used, controlled, sold, transferred, manufactured or obtained a license to possess, use, control, sell, transfer or manufacture a firearm, in violation of 18 Pa. C.S. §6105 (a).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTNLiveScan Number G 773906-0	Complaint/Incident Number 8667-17
Defendant Name	First: TODD	Middle: ANTHONY	Last: ROBINSON

Indicate Offense	<input type="checkbox"/> Attempt 18.901.A	<input type="checkbox"/> Solicitation 18.902.A	<input type="checkbox"/> Conspiracy 18.903						
Lead?	3	3304	A1	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NOIC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					
Statute Description/Acts of the accused associated with this Offense:									
18.3304A1 CRIMINAL MISCHIEF F3 1 COUNT The actor damaged tangible property of another, namely Wilkinsburg Borough, intentionally, in the employment of fire, explosives, or other dangerous means listed in Section 3302(a) (relating to causing or risking catastrophe, causing pecuniary loss in excess of \$5,000, or substantial interruption or impairment of public communication, transportation, supply of water, gas or power, or other public service, in violation of 18 Pa. C.S. §3304 (a)(1) and (b)).									

Indicate Offense	<input type="checkbox"/> Attempt 18.901.A	<input type="checkbox"/> Solicitation 18.902.A	<input type="checkbox"/> Conspiracy 18.903						
Lead?	4	6106	A1	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NOIC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					
Statute Description/Acts of the accused associated with this Offense:									
18.6106A1 CARRYING FIREARM WITHOUT A LICENSE F3 1 COUNT The actor carried, a firearm in a vehicle or concealed on or about his person without a valid and lawfully issued license under Chapter 61, of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §6106(a)(1).									

Indicate Offense	<input type="checkbox"/> Attempt 18.901.A	<input type="checkbox"/> Solicitation 18.902.A	<input type="checkbox"/> Conspiracy 18.903						
Lead?	5	3733	A	of the	75	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NOIC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					
Statute Description/Acts of the accused associated with this Offense:									
75.3733A FLEEING OR ATTEMPTING TO ELUDE POLICE OFFICER F3 1 COUNT The actor drove a motor vehicle and willfully failed or refused to bring his vehicle to a stop, or otherwise fled or attempted to elude a pursuing police officer, having been given visual or audible signal to bring the vehicle to a stop, and/or actor committed violation of 75 Pa.C.S. §3802, relating to driving under the influence of alcohol or a controlled substance, and/or actor crossed a State line and/or actor endangered a law enforcement officer or member of the general public due to the actor engaging in a high-speed chase, in violation of 75 Pa. C.S. §3733 and §3733(2)(i)(ii) and (iii).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	CRNLiveScan Number G 773906-0	Complaint/Incident Number 8867-17
Defendant Name	First TODD	Middle ANTHONY	Last ROBINSON

Indicate Offense	<input type="checkbox"/> Attempt 18901 A	<input type="checkbox"/> Solicitation 18902 A	<input type="checkbox"/> Conspiracy 18903
Lead?	6	2705	of the 18
Offense#	Section	Subsection	PA Statute (Title)
Counts	2	M2	Grade
NDC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description/Acts of the accused associated with this Offense:			
18 2705 RECKLESSLY ENDANGERING ANOTHER PERSON M2 2 COUNTS			
The actor recklessly engaged in conduct which placed or may have placed Sgt. Matt Morrison in danger of death or serious bodily injury, in violation of 18 Pa. C.S. §2705.			
The actor recklessly engaged in conduct which placed or may have placed Officer Chris Duncan in danger of death or serious bodily injury, in violation of 18 Pa. C.S. §2705.			

Indicate Offense	<input type="checkbox"/> Attempt 18901 A	<input type="checkbox"/> Solicitation 18902 A	<input type="checkbox"/> Conspiracy 18903
Lead?	7	3743	A of the 75
Offense#	Section	Subsection	PA Statute (Title)
Counts	1	M3	Grade
NDC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description/Acts of the accused associated with this Offense:			
75 3743A ACCIDENT INVOLVING DAMAGE TO ATTENDED VEHICLE OR PROPERTY M3 1 COUNT			
The actor, the driver of a vehicle involved in an accident resulting only in damage to a vehicle or other property which was driven or attended by a person, failed to immediately stop the vehicle at the scene of the accident or as close thereto as possible and forthwith return to the scene and failed to remain at the scene of the accident until said actor had fulfilled the requirements of Section 3744 (relating to duty to give information and render aid), in violation of 75 Pa.C.S. §3743(a).			

Indicate Offense	<input type="checkbox"/> Attempt 18901 A	<input type="checkbox"/> Solicitation 18902 A	<input type="checkbox"/> Conspiracy 18903
Lead?	8	3736	A of the 75
Offense#	Section	Subsection	PA Statute (Title)
Counts	1	S	Grade
NDC Offense Code	UCR/NERS Code		
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description/Acts of the accused associated with this Offense:			
75 3736A RECKLESS DRIVING S 1 COUNT			
The actor drove a vehicle in willful or wanton disregard for the safety of persons or property, in violation of 75 Pa. C.S. §3736.			



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	CJMLiveScan Number G 773806-0	Complaint/Incident Number 8667-17
Defendant Name	First: TODD	Middle: ANTHONY	Last: ROBINSON

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 P.A.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding page(s) numbered through .

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

APKOL

25th, 2017

TLS

(Date)

(Signature of Affiant)

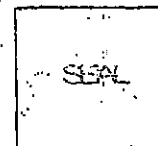
AND NOW on this date April 25, 2017 I certify that the complaint has been properly completed and verified.
An affidavit of probable cause must be completed before a warrant can be issued.

PMC

(Magisterial District Court Number)

TLK

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	Criminal Case Number G 773906-0	Complaint/Incident Number 8667-17
Defendant Name	First TODD	Middle ANTHONY	Last ROBINSON

AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:

04/24/2017

- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

04/24/2017

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):

Victim and witness statements.

- b) How the source of information knows this particular person committed the crime:

Victim and witness statements.

- c) How both Affiant and/or source of information knows that a particular crime has been committed:

Victim and witness statements.

3. WHAT CRIMES:

18 6105 A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS
 18 2702 A2 AGGRAVATED ASSAULT
 18 2702 A2 AGGRAVATED ASSAULT
 75 3733 A FLEEING OR ATTEMPTING TO ELUDE POLICE OFFICER
 75 3743 A ACCIDENT INVOLVING DAMAGE TO ATTENDED VEHICLE OR PROPERTY
 18 3304 A1 CRIMINAL MISCHIEF
 18 2705 RECKLESSLY ENDANGERING ANOTHER PERSON
 18 2705 RECKLESSLY ENDANGERING ANOTHER PERSON
 18 6108 A1 CARRYING FIREARM WITHOUT A LICENSE
 75 3736 A RECKLESS DRIVING

4. WHERE CRIME(S) COMMITTED:

430 PENN AVE WILKINSBURG PA 15221

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.
 Source has given information in the past which has led to arrest and/or conviction
- X Defendant's reputation for criminal activity
 This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN LiveScan Number G 773906-0	Complaint/Incident Number 8667-17
Defendant Name	First TODD	Middle ANTHONY	Last ROBINSON

Affiants are Detectives Todd Dolfi and Thomas Foley of the Allegheny County Police Department and are assigned to the Homicide Unit. Affiants are law enforcement officers of the Commonwealth of Pennsylvania and are empowered to make arrests for criminal offenses enumerated within this document. All of the information contained in this affidavit was learned directly by the affiants, or was communicated to them by other law enforcement officers, victims, witnesses, or medical clinicians and technicians.

Affiants have been police officers in excess of a combined forty years and have attended and completed numerous training courses in reference to the investigation and prosecution of criminal acts. As patrol officers and as criminal investigators affiants have conducted hundreds of investigations and participated in the prosecution of criminal acts within the jurisdiction of Allegheny County and the District of Columbia.

On April 24, 2017 at approximately 4:25AM Sgt. Matt Morrison of the Wilkensburg Police Department was on patrol in the 1000 block of Taylor Way when he encountered a male passed out in a vehicle bearing PA Registration KJR8017. Sgt. Morrison radioed for back up and Officer Duncan arrived at his location. At that time, the Officers made contact with the male and woke him up. The male was asked for his identification and he provided PA drivers license 25499398 Todd Anthony Robinson. Officer Duncan ran a check with County Index and the OLN came back negative for wants and warrants in NCIC. Officers then released Robinson from the scene and he drove away.

Several minutes later County Index advised the Wilkensburg Units that the individual they had just run had a valid arrest warrant in NCIC for a state parole violation. They also advised the Wilkensburg Officers that Robinson had violent tendencies towards police officers, was an escape risk, abused drugs and had arrests for armed robbery and homicide on his rap sheet.

Sgt. Morrison and Officer Duncan began to search the borough of Wilkensburg to see if they could locate Robinson. At approximately 5:30AM Sgt. Morrison located what he believed to be the same vehicle they encountered in the 1000 block of Taylor Way parked at the McDonalds located at 430 Penn Ave in Wilkensburg. Sgt. Morrison advised Officer Duncan to come to his location and he confirmed the registration plate with County 911 to confirm it was the same registration plate from earlier.

Sgt. Morrison and Officer Duncan were sitting in the parking lot of the McDonalds and could see Todd Robinson in the store and confirmed it was the same individual they stopped before. Officers decided for the safety of the employees and other patrons in the store that they would wait for Robinson to exit before they executed the arrest.

Officers observed Robinson exiting the restaurant and Officer Duncan pulled up in his patrol car behind Robinson's car and activated his emergency lights. Officer Duncan stated to Robinson that they needed to speak with him. At that time, Robinson ignored the Officers and rushed to his vehicle entering the drivers seat. Officer Duncan ordered Robinson to get out of the vehicle and noted that the drivers side front window was in the down position. Robinson continued to ignore Officer Duncan's commands and he started his vehicle. Robinson immediately placed his vehicle into reverse and accelerated striking Officer Duncan's patrol car and nearly striking Officer Duncan and running him over. Robinson then placed his vehicle in drive, accelerated forward striking the sidewalk to the store. Again, Robinson placed his vehicle in reverse, accelerated backwards, nearly striking the Officers and striking Officer Duncan's patrol car again.

At that time, Officer Duncan in fear for his life, Sgt. Morrison's life and the life of anyone else in the area, discharged his weapon at Robinson. Sgt. Morrison, also in fear for his and the life of others also discharged his weapon at Robinson.

Robinson continued to maneuver his vehicle and exited the parking lot of the McDonald's onto Penn Ave at a high rate of speed towards the City of Pittsburgh. Sgt. Morrison advised over the radio what had occurred and advised the description and direction of flight. Sgt. Morrison and Officer Duncan then entered their vehicles and started down Penn Ave in the same direction. As the



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	Criminal Case Number G 773906-0	Complaint/Incident Number 8667-17
Defendant Name	First TODD	Middle ANTHONY	Last ROBINSON

Officers approached the intersection of Penn Ave and Brushton Ave the observed Robinson's vehicle crashed into a fire hydrant and abandoned.

A male witness advised Officer Duncan that the male who was driving the car exited and ran towards Peppis' restaurant. Officer Duncan started that direction and located Robinson lying in some bushes next to the Family Dollar Store. Robinson was bleeding and appeared to be suffering from a gunshot wound. EMS was immediately called and Robinson was transported to UPMC Presbyterian for treatment.

At that time, the investigative assistance of the Allegheny County Police Homicide Unit was requested. Detectives Dolfi, Foley and Grill along with MCU Scientist Tom Morgan responded to 430 Penn Ave to process the scene. During processing Detectives recovered two spent FC .45 auto casings and one projectile.

Detectives Perry, Caruso and Hoffman along with MCU Scientist Susie Stanich processed the scene at Penn Ave and Brushton Ave. Robinson's car was towed to ACPD Headquarters for processing.

Detective Kinavey responded to UPMC Presbyterian and was advised that Robinson was currently in surgery.

On April 24, 2017 at approximately 11:55AM Detective Perry applied for and was granted a search warrant for the car Robinson was operating. The car, a 2003 Hyundai Elantra bearing PA registration KJR9017. During that processing, Detective Perry recovered Todd Robinson's drivers license, a Ruger Mark II Target .22 Long Rifle Pistol Serial number 211-38647, approximately 6 boxes of ammunition and a spent projectile.

A check of Robinson's criminal history revealed a prior conviction for Criminal Homicide which excludes Robinson from possessing a firearm. Further, a check with Index confirmed Robinson did not have a valid carry permit.

Based on the above I request that a warrant be issued for Todd Anthony Robinson.

I, TODD DOLFI *Todd Dolfi*, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Todd Dolfi
(Signature of Affiant)

Sworn to me and subscribed before me this 25th day of APRIL, 2017
4/25/17 Date *[Signature]* Magisterial District Judge

My commission expires first Monday of January,

TOM SWAN,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-3-04
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2022

SEAL